## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

NEAL MILLER and DONNA MILLER, : CIVIL ACTION

Individually and as Administrators of the :

Estate of RYAN MILLER, a Minor, Deceased

:

v. : NO. 20-cv-06301-MMB

:

POLICE OFFICER JOSEPH WOLK

## PLAINTIFFS' RESPONSE TO DEFENDANT'S MOTION FOR SUMMARY JUDGMENT

Plaintiffs Neal Miller and Donna Miller, by and through their undersigned counsel, hereby file their Opposition to Defendant's Motion for Summary Judgment pursuant to Federal Rule of Civil Procedure 56. In support of their opposition, Plaintiffs incorporate the attached Memorandum of Law as well as their response to Defendant's Statement of Material Facts as well as their own Counterstatement of Material Facts. Plaintiff respectfully requests that Defendant's Motion for Summary Judgement be denied with prejudice.

Respectfully submitted,

FLAGER & ASSOCIATES, P.C.

By: /s/ Michael S. Levin

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Dated: February 15, 2024